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*dba SILICON VALLEY POWER*

UNITED STATES BANKRUPTCY COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

In re	)	Case Nos. 19-30088 DM (Lead Case)
	)	19-30089 DM
PG&E CORPORATION	)	
-and-	)	Chapter 11
PACIFIC GAS AND ELECTRIC	)	Jointly Administered
COMPANY,	)	
Debtors.	)	<b>NOTICE OF WITHDRAWAL WITH</b>
	)	<b>PREJUDICE OF CURE DISPUTE AND</b>
<input type="checkbox"/> Affects PG&E Corporation	)	<b>MOTION TO COMPEL ASSUMPTION OR</b>
<input type="checkbox"/> Affects Pacific Gas and Electric Company	)	<b>REJECTION OF EXECUTORY CONTRACT</b>
<input checked="" type="checkbox"/> Affects both Debtors.	)	<b>CONCERNING THE GRIZZLY</b>
	)	<b>DEVELOPMENT AND MOKELUMNE</b>
* All papers shall be filed in the Lead Case	)	<b>SETTLEMENT AGREEMENT BY THE</b>
No. 19-30088 DM	)	<b>CITY OF SANTA CLARA dba SILICON</b>
	)	<b>VALLEY POWER</b>
	)	
	)	[Related To Docket Nos. 7208, 7691, 10998,
	)	13306, 13366 and 13409]
	)	
	)	Date: N/A

) Time: N/A  
 ) Courtroom: 17  
 ) Place: United States Bankruptcy Court  
 ) 450 Golden Gate Ave., 16<sup>th</sup> Floor  
 ) San Francisco, CA 94102  
 ) Judge: Hon. Dennis Montali  
 )

**TO DEBTORS AND ALL OTHER PARTIES OF INTEREST:**

The City of Santa Clara, dba Silicon Valley Power (“SVP”), pursuant to the Settlement Agreement dated November 21, 2022 between SVP and PG&E Corporation (“PG&E Corp.”) and Pacific Gas and Electric Company (the “Utility”), as debtors and debtors in possession (collectively, the “Debtors” or, as reorganized pursuant to the Plan, the “Reorganized Debtors”) (See Docket No. 13366), approved by the above entitled Court on January 4, 2023 (Docket No. 13409), withdraws, with prejudice, the following: (a) the Objection to Cure Amount and Request for Adequate Assurance of Future Performance by Counterparty City of Santa Clara dba Silicon Valley Power filed May 15, 2020 (Docket No. 7208); (b) the Supplemental Objection to Cure Amount and Request for Adequate Assurance of Future Performance by Counterparty City of Santa Clara dba Silicon Valley Power filed June 1, 2020 (Docket No. 7691); and (c) the Motion to Compel Assumption or Rejection of Executory Contract Concerning the Grizzly Development and Mokelumne Settlement Agreement filed July 30, 2021 (Docket No. 10998).

DATED: March 3, 2023.

BOUTIN JONES INC.

By: /s/ Thomas G. Mouzes

Thomas G. Mouzes

Mark Gorton

Robert D. Swanson

-and-

Lisa S. Gast

DUNCAN, WEINBERG, GENZER & PEMBROKE,  
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Attorney for CITY OF SANTA CLARA dba SILICON  
VALLEY POWER

## CERTIFICATE OF SERVICE

I am employed in the County of Sacramento; my business address is 555 Capitol Mall, Suite 1500, Sacramento, California 95814. I am over the age of eighteen years and not a party to the foregoing action.

On March 6, 2023 I served the within:

**(1) NOTICE OF WITHDRAWAL WITH PREJUDICE OF CURE DISPUTE AND MOTION TO COMPEL ASSUMPTION OR REJECTION OF EXECUTORY CONTRACT CONCERNING THE GRIZZLY DEVELOPMENT AND MOKELUMNE SETTLEMENT AGREEMENT BY THE CITY OF SANTA CLARA dba SILICON VALLEY POWER**

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**(by mail)** on all parties in said action by regular, first class United States mail, postage fully pre-paid, by placing a true copy thereof enclosed in a sealed envelope in a designated area for outgoing mail, addressed as set forth below. At Boutin Jones Inc., mail placed in that designated area is given the correct amount of postage and is deposited that same day, in the ordinary course of business, in a United States mailbox in the City of Sacramento, California.

*See attached list (Exhibit A) of parties served by first class mail.*

**TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**  
Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 3/6/2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

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I declare under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct.

Executed on March 6, 2023, at Sacramento, California.

/s/ Carmelia V. Domingo  
CARMELIA V. DOMINGO

1301885.1

**Exhibit A**  
Master Service List - Case No. 19-30088 (DM)  
Served as set forth below

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**Exhibit A**  
Master Service List - Case No. 19-30088 (DM)  
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**Exhibit A**  
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**Exhibit A**  
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**Exhibit A**  
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**Exhibit A**  
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**Exhibit A**  
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Counsel for Consolidated Edison Development Inc.	Troutman Pepper Hamilton Sanders LLP Attn: Gabriel Ozel, Jared D. Bissell 11682 El Camino Real, Suite 400 San Diego, CA 92130-2092	jared.bissell@troutman.com	Email
Counsel to Southern Power Company, Consolidated Edison Development, Inc.	Troutman Sanders LLP Attn: Dean Morehous 3 Embarcadero Center Suite 800 San Francisco, CA 94111	dean.morehous@troutman.com	Email
Counsel for Consolidated Edison Development Inc.	Troutman Sanders LLP Attn: Hugh M. McDonald 875 Third Avenue New York, NY 10022	hugh.mcdonald@troutman.com	Email

**Exhibit A**  
Master Service List - Case No. 19-30088 (DM)  
Served as set forth below

DESCRIPTION	NAME	EMAIL	METHOD OF SERVICE
Counsel for Southern Power Company and Osmose Utilities Services, Inc.	Troutman Sanders LLP Attn: LaShaun Jones 600 Peachtree St. NE Suite 3000 Atlanta, GA 30308	LaShaun.Jones@troutman.com	Email
Counsel to the Federal Energy Regulatory Commission	U.S. Department of Justice, Civil Division Attn: Joseph H. Hunt, Ruth A. Harvey, Kirk Manhardt, Matthew Troy, Marc S. Sacks, Shane Huang, Michael S. Tye, Rodney A. Morris 1100 L Street, NW Room 10030 Washington, DC 20530	shane.huang@usdoj.gov michael.tye@usdoj.gov Rodney.Morris2@usdoj.gov	Email
Counsel to the Federal Energy Regulatory Commission	U.S. Department of Justice, Civil Division Attn: Joseph H. Hunt, Ruth A. Harvey, Kirk Manhardt, Matthew Troy, Marc S. Sacks, Shane Huang, Michael S. Tye, Rodney A. Morris P.O. Box 875 Ben Franklin Station Washington, DC 20044-0875	shane.huang@usdoj.gov michael.tye@usdoj.gov Rodney.Morris2@usdoj.gov	Email
Nuclear Regulatory Commission	U.S. Nuclear Regulatory Commission Attn: General Counsel U.S. NRC Region IV 1600 E. Lamar Blvd. Arlington, TX 76011		First Class Mail
Nuclear Regulatory Commission	U.S. Nuclear Regulatory Commission Attn: General Counsel Washington, DC 20555-0001		First Class Mail
Interested Party	Union Pacific Railroad Company Attn: Tonya W. Conley, Lila L. Howe 1400 Douglas Street STOP 1580 Omaha, NE 68179 Unsecured Creditor Claim No. 7072 Attn: John Ramirez, Marta Ramirez 38006 Pueblo Road Hinkley, CA 92347	bankruptcynotices@up.com	Email
Unsecured Creditor Claim No. 7072	Unsecured Creditor Claim No. 7083 Attn: Aurang Zaib Khan, Halima Zahib 1969 East Cooley Ave. San Bernardino, CA 92408		First Class Mail
Unsecured Creditor Claim No. 7083	Unsecured Creditor Claim No. 7167 Attn: Ken Nitao 244 S. Citrus Avenue Alhambra, CA 91801		First Class Mail
Unsecured Creditor Claim No. 7167	Unsecured Creditor Claim No. 7168 Attn: Robert Miller, Donna Learmont 37241 Sycamore Street Hinkley, CA 92347		First Class Mail
Unsecured Creditor Claim No. 7168			First Class Mail



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DESCRIPTION	NAME	EMAIL	METHOD OF SERVICE
Unsecured Creditor Claim No. 7171	Unsecured Creditor Claim No. 7171 Attn: Shirley Holcroft, Sam Cabrera 2610 S Mariposa Rd Apache Jct, AZ 85119-9252		First Class Mail
Unsecured Creditor Claim No. 7175	Unsecured Creditor Claim No. 7175 Attn: Andrea Williams, Dan S. Williams 36796 Hillview Road Hinkley, CA 92347		First Class Mail
Unsecured Creditor Claim No. 7176	Unsecured Creditor Claim No. 7176 Attn: Keith Hawes P.O. Box 376 Hinkley, CA 92347		First Class Mail
Unsecured Creditor Claim No. 7180	Unsecured Creditor Claim No. 7180 Attn: Oscar Urbina 3617 Slauson Ave. Maywood, CA 90270		First Class Mail
Unsecured Creditor Claim No. 7183	Unsecured Creditor Claim No. 7183 Attn: Martin Garza, Lynette Brown P.O. Box 344 Hinkley, CA 92347		First Class Mail
Unsecured Creditor Claim No. 7199	Unsecured Creditor Claim No. 7199 Attn: Carolyn Bolin, William Bolin 36310 Lenwood Road Hinkley, CA 92347		First Class Mail
Unsecured Creditor Claim No. 7200	Unsecured Creditor Claim No. 7200 Attn: Sandra L. Brown 5432 Macedonia Church Rd Prosperity, SC 29127-7389		First Class Mail
Unsecured Creditor Claim No. 7201	Unsecured Creditor Claim No. 7201 Attn: Barbara A. Vinson, Lloyd K. Vinson 3220 Cindy Circle Anderson, CA 96007		First Class Mail
Unsecured Creditor Claim No. 7226	Unsecured Creditor Claim No. 7226 Attn: Rosaiba Hernandez 18284 Pacific Street Hesperia, CA 92345		First Class Mail
Unsecured Creditor Claim No. 7229	Unsecured Creditor Claim No. 7229 Attn: David Matthiesen, Candace Matthiesen 36709 Hidden River Road Hinkley, CA 92347		First Class Mail
Unsecured Creditor Claim No. 7244	Unsecured Creditor Claim No. 7244 Attn: Agustin Carrera, Maritza Carrera 886 Gina Ct. Upland, CA 91784		First Class Mail
Unsecured Creditor Claim No. 7244	Unsecured Creditor Claim No. 7244 Attn: Aquilla Frederick 20455 Halstead Road Hinkley, CA 92347		First Class Mail

**Exhibit A**  
Master Service List - Case No. 19-30088 (DM)  
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DESCRIPTION	NAME	EMAIL	METHOD OF SERVICE
Unsecured Creditor Claim No. 7264	Unsecured Creditor Claim No. 7264 Attn: Darlene Herring Jenkins PO Box 512 Newberry Spgs, CA 92365-0512		First Class Mail
Unsecured Creditor Claim No. 7301	Unsecured Creditor Claim No. 7301 Attn: Marina Riebeling, Adolfo Riebeling 4600 Jerry Ave. Baldwin Park, CA 91706		First Class Mail
Unsecured Creditor Claim No. 7585	Unsecured Creditor Claim No. 7585 Attn: Clell Courtney, Hennie Courtney 25595 Ash Road Barstow, CA 92311		First Class Mail
Unsecured Creditor Claim No. 7591	Unsecured Creditor Claim No. 7591 Attn: Cindy Sue Downing P.O. Box 376 Hinkley, CA 92347		First Class Mail
Unsecured Creditor Claim No. 7657	Unsecured Creditor Claim No. 7657 Attn: Joel A. Christison PO Box 2635 Big River, CA 92242-2635		First Class Mail
Unsecured Creditor Claim No. 7704	Unsecured Creditor Claim No. 7704 Attn: Nick Panchev 25633 Anderson Avenue Barstow, CA 92311		First Class Mail
Unsecured Creditor Claim No. 8273	Unsecured Creditor Claim No. 8273 Attn: Charles Matthiesen, Matsue Matthiesen 36771 Hidden River Rd. Hinkley, CA 92347		First Class Mail
Unsecured Creditor Claim No. 8274	Unsecured Creditor Claim No. 8274 Attn: Juliana Martinez, Manuel Martinez 36633 Hidden River Road Hinkley, CA 92347		First Class Mail
Unsecured Creditor Claim No. 8274	Unsecured Creditor Claim No. 8274 Attn: Norman Halstead 20455 Halstead Road Hinkley, CA 92347		First Class Mail
Unsecured Creditor Claim No. 8278	Unsecured Creditor Claim No. 8278 Attn: Kimberly Blowney 36816 Hillview Road Hinkley, CA 92347		First Class Mail
Unsecured Creditor Claim No. 8283	Unsecured Creditor Claim No. 8283 Attn: Saray Ordaz, Victor Suarez 1042 E. Sandison St. Apt. 1 Wilmington, CA 90744		First Class Mail
Unsecured Creditor Claim No. Pending	Unsecured Creditor Claim No. Pending Attn: Yvonne Kirkpatrick, Herbert Nethery 23394 Alcutia Rd. Hinkley, CA 92347		First Class Mail

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DESCRIPTION	NAME	EMAIL	METHOD OF SERVICE
US Securities and Exchange Commission	US Securities And Exchange Commission Attn: Jina Choi, Regional Director San Francisco Regional Office 44 Montgomery Street, Suite 2800 San Francisco, CA 94104	sanfrancisco@sec.gov	Email
US Securities and Exchange Commission	US Securities And Exchange Commission Attn: Office of General Counsel 100 F St. NE MS 6041B Washington, DC 20549 Vedder Price Ca LLP Attn: Scott H. Olson 275 Battery Street, Suite 2464 San Francisco, CA 94111	secbankruptcy@sec.gov	Email
Counsel for Interstate Fire & Casualty Company	Vorys, Sater, Seymour And Pease LLP Attn: Tiffany Strelow Cobb, Esq. 52 East Gay Street Columbus, OH 43215	tscoobb@vorys.com	First Class Mail
Counsel for Vertiv Corporation, Nuance Communications, Inc.	Wagstaffe, Von Loewenfeldt, Busch & Radwick, LLP Attn: James M. Wagstaffe & Frank Busch 100 Pine Street Suite 725 San Francisco, CA 94111	wagstaffe@wvblaw.com busch@wvblaw.com	Email
Counsel to Public Employees Retirement Association of New Mexico	Walkup Melodia Kelly & Schoenberger Attn: Michael A. Kelly, Khalidoun A. Baghdadi, Max Schuver 650 California Street 26th Floor San Francisco, CA 94108	mkelly@walkuplawoffice.com kbaghdadi@walkuplawoffice.com mschuver@walkuplawoffice.com	Email
Individual Plaintiffs Executive Committee appointed by the California Superior Court in the North Bay Fire Cases, Judicial Council Coordination Proceeding Number 4955, Pursuant to the terms of the Court's Case Management Order No. 1	Walter Wilhelm Law Group A Professional Corporation Attn: Michael L. Wilhelm 205 E. River Park Circle Suite 410 Fresno, CA 93720	Mwilhelm@W2LG.com	Email
Counsel for Aera Energy LLC, Midway Sunset Congeneration Company	Weij Gotshal & Manges LLP Attn: Stephen Karotkin, Jessica Liou, Matthew Goren 767 Fifth Avenue New York, NY 10153-0119	stephen.karotkin@weil.com matthew.goren@weil.com	Email
Counsel to Debtor	Weinberg Roger & Rosenfeld Attn: Emily P. Rich 1001 Marina Village Parkway Suite 200 Alameda, CA 94501-1091	jessica.liou@weil.com bankruptcycourtnotices@unioncounsel.net erich@unioncounsel.net tmainguy@unioncounsel.net cgray@unioncounsel.net	Email
Counsel for Engineers and Scientists of California, Local 20, IPTTE, Counsel for SEIU United Service Workers - West	Weintraub Tobin Chediak Coleman Grodin Attn: Julie E. Oelsner 400 Capitol Mall, 11th Floor Sacramento, CA 95814	joelsner@weintraub.com	Email
Counsel to Southwire Company, LLC	Wendel Rosen LLP Attn: Mark S. Bostick, Lisa Lenherr 1111 Broadway 24th Floor Oakland, CA 94607	mbostick@wendel.com llenherr@wendel.com	Email
Counsel to Michael G. Kasolas, Claims Representative			Email

**Exhibit A**  
Master Service List – Case No. 19-30088 (DM)  
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DESCRIPTION	NAME	EMAIL	METHOD OF SERVICE
Counsel for Semptra Energy, San Diego Gas & Electric Company, and Southern California Gas Company	White & Case LLP Attn: J. Christopher Shore 1221 Avenue of the Americas New York, NY 10020-1095	cshore@whitecase.com	Email
Counsel for Semptra Energy, San Diego Gas & Electric Company, and Southern California Gas Company	White & Case LLP Attn: Roberto J. Kampfner 555 South Flower Street Suite 2700 Los Angeles, CA 90071	rkampfner@whitecase.com	Email
Counsel for Semptra Energy, San Diego Gas & Electric Company, and Southern California Gas Company	White & Case LLP Attn: Thomas E. Lauria, Matthew C. Brown Southeast Financial Center 200 South Biscayne Boulevard, Suite 4900	tlauria@whitecase.com mbrown@whitecase.com	Email
Counsel for Ballard Marine Construction, Inc.	Williams Kastner Attn: Todd W. Blischke 601 Union Street Suite 4100 Seattle, WA 98101-2380	TBlischke@williamskastner.com	Email
Counsel to Subrogation Trust Advisory Board	Willkie Farr & Gallagher LLP Attn: Alexander L. Cheney One Front Street San Francisco, CA 94111	acheney@willkie.com	Email
Counsel to Subrogation Trust Advisory Board	Willkie Farr & Gallagher LLP Attn: Benjamin P. McCallen, Daniel Forman, Charles D. Cording 787 Seventh Avenue New York, NY 10019	bmccallen@willkie.com dforman@willkie.com ccording@willkie.com	Email
Counsel for Ad Hoc Group of Subrogation Claim Holders	Willkie Farr & Gallagher LLP Attn: Matthew A. Feldman, Joseph G. Minias, Daniel I. Forman 787 Seventh Avenue New York, NY 10019-6099	mfeldman@willkie.com jminias@willkie.com dforman@willkie.com	Email
Interested Party ICE NGX Canada Inc. Counsel for Macquarie Energy LLC, Counsel for California Efficiency + Demand Management Council, Counsel for Cypress Energy Partners, L.P., Tulsa Inspection Resources – PUC, LLC, Tulsa Inspection Resources, LLC, CF Inspection Management, LLC, and Cypress Energy Management – TIR, LLC, Counsel for Peninsula Clean Energy Authority, Counsel to the City of San Jose, CA	Wilmer Cutler Pickering Hale & Dorr LLP Attn: Chris Johnstone 950 PAGE MILL ROAD PALO ALTO, CA 94304	CHRIS.JOHNSTONE@WILMERHALE.COM	Email
Counsel to the City of San Jose, CA	Winston & Strawn LLP Attn: David Neier 200 Park Avenue 40th Floor New York, NY 10166-4193	dneier@winston.com	Email
Counsel for Macquarie Energy LLC	Winston & Strawn LLP Attn: Jennifer Machlin Cecil 101 California Street 35th Floor San Francisco, CA 94111-5840	jcecil@winston.com	Email
	Winston & Strawn LLP Attn: Michael A. Yuffee 1901 L Street NW Washington, DC 20036		First Class Mail

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DESCRIPTION	NAME	EMAIL	METHOD OF SERVICE
Counsel for Hoffman Southwest Corp. dba Professional Pipeline Services	Winthrop Couchot Golubow Hollander, LLP Attn: Richard H. Golubow 1301 Dove Street Suite 500 Newport Beach, CA 92660	rgolubow@wcghlaw.com	Email
Counsel for Liberty Mutual Life Insurance Company	Wolkin Curran, LLP Attn: James D. Curran, Esq. 111 Maiden Lane, 6th Floor San Francisco, CA 94108	jcurran@wolkincurran.com	Email
Counsel for Ballard Marine Construction, Inc.	Worley Law, P.C. Attn: Kirsten A. Worley 1572 Second Avenue San Diego, CA 92101	kw@wlawcorp.com	Email
Counsel to Subrogation Wildfire Trust	Young Conaway Stargatt & Taylor, LLP Attn: Edwin J. Harron, Sara Beth A.R. Kohut Rodney Square, 1000 North King Street Wilmington, DE 19801	eharron@ycst.com	Email
Counsel to Santiago Gatto and Anastasia Tkai	Young Ward & Lothert, A Professional Law Corporation Attn: Scott Ward, Esq. 995 Morning Star Dr., Suite C Sonoma, CA 95370-5192	Info@youngwardlothert.com	Email